

# EXHIBIT T

**Depo Designation Tracking**

- **Satz**
  - Arista – 7 minutes
  - Cisco – 7 minutes
  - Exhibits Disclosed

## Cisco v Arista

 **Satz, Greg L. (Vol. 01) - 03/23/2016**

1 CLIP (RUNNING 00:14:10.719)

 Good morning, Mr. Satz. Can you please ...

**SATZ\_ALL**

**32 SEGMENTS (RUNNING 00:14:10.719)**



**1. PAGE 5:17 TO 5:22 (RUNNING 00:00:13.888)**

17 Q. Good morning, Mr. Satz. Can you please  
 18 state your full name.  
 19 A. Greg Leonard Satz.  
 20 Q. Mr. Satz, you are not represented by  
 21 counsel today; is that right?  
 22 A. Correct.

**2. PAGE 8:01 TO 8:11 (RUNNING 00:00:38.412)**

00008:01 Q. All right. And when did you leave  
 02 Cisco?  
 03 A. 2003.  
 04 Q. For what period of time were you  
 05 employed by Cisco?  
 06 A. From 1987 through 2003, and I worked  
 07 for Cisco prior without a paycheck.  
 08 Q. What positions did you hold at Cisco?  
 09 A. Titled positions were engineer,  
 10 software engineer. I was a software manager and  
 11 then a software director.

**3. PAGE 8:12 TO 8:17 (RUNNING 00:00:21.090)**

12 Q. Can you tell me in general terms what  
 13 your responsibilities were at Cisco?  
 14 A. They changed about every six months.  
 15 Generally speaking, it was to deliver software  
 16 product to customers that they were willing to pay  
 17 for.

**4. PAGE 8:18 TO 8:20 (RUNNING 00:00:10.238)**

18 Q. How many people had -- were employed at  
 19 Cisco when you joined?  
 20 A. Four or five.

**5. PAGE 9:10 TO 10:02 (RUNNING 00:01:12.030)**

10 Q. Over the years, do you recall the  
 11 different people that you reported to at Cisco?  
 12 A. I do.  
 13 Q. Who were they?  
 14 A. Kirk Lougheed was my first boss. We  
 15 hired Bob Burnett as the first engineering VP  
 16 manager. And then Frank Marshall stood in. We  
 17 had a rent-a-VP for a while. Rungee, I think his  
 18 name was, Bob Rungee. It is a miracle that this  
 19 is being remembered. Just appreciate that value.  
 20 And I stepped down during Frank's time and then  
 21 went to work for -- I had different project leads,  
 22 but I reported into engineering, I think, to  
 23 Michelle Lingue.  
 24 Q. Is it fair to say that you became  
 25 familiar with Cisco's command line interface while  
 00010:01 you were there?  
 02 A. Yes, that's fair to say.

## Cisco v Arista

---

### 6. PAGE 10:10 TO 10:20 (RUNNING 00:00:31.435)

10 Q. Did you have input into the command  
 11 line interface?  
 12 A. Yeah. I was going to draw a  
 13 distinction for the benefit of that. So the  
 14 command line interface is a generic term, isn't  
 15 descriptive enough, because there's the content of  
 16 it and there's the mechanics of it. So for the  
 17 purpose of answering, I had some responsibility  
 18 for the mechanics of it; the content of it was  
 19 distributed around the engineering organization in  
 20 an effort to deliver services and products.

### 7. PAGE 16:23 TO 17:12 (RUNNING 00:00:42.465)

23 Q. Were you familiar with something called  
 24 the DECSYSTEM-20?  
 25 A. Yes.  
 00017:01 Q. What was that?  
 02 A. I worked on the DECSYSTEM-20s through  
 03 college. And SRI had one, but I wasn't  
 04 responsible for it. And Stanford had lots of  
 05 them. It was a very big -- it was a very big  
 06 DECSYSTEM-20 user. So they were another Digital  
 07 Equipment Corporation mainframe with a different  
 08 operating system and a whole different hardware  
 09 platform. Just another computer.  
 10 Q. Okay. What was the operating system on  
 11 the DECSYSTEM-20?  
 12 A. It was TOPS-20.

### 8. PAGE 30:08 TO 30:10 (RUNNING 00:00:08.081)

08 Q. Was -- to your knowledge, was  
 09 access.list used in any other operating systems or  
 10 softwares, software?

### 9. PAGE 30:12 TO 30:13 (RUNNING 00:00:03.646)

12 THE WITNESS: I can't say I've ever seen  
 13 access.list before this application.

### 10. PAGE 32:03 TO 32:08 (RUNNING 00:00:16.878)

03 Q. Had you ever heard of or used show  
 04 commands in any context before you went to Cisco?  
 05 A. Every computer has show commands. I  
 06 mean every operating system had used the word  
 07 "show" as a way to convey internal information  
 08 outward.

### 11. PAGE 32:09 TO 32:17 (RUNNING 00:00:48.324)

09 Q. What about banner, which, by the way,  
 10 I see at the bottom of Page 8 of Exhibit 36. But  
 11 my question is more general, which is were you  
 12 aware of a banner command before you went to  
 13 Cisco?  
 14 A. I don't remember. I had used, by then,  
 15 anywhere from 15 to 20 different operating  
 16 systems. And so I -- banner doesn't stand out as  
 17 anything.

### 12. PAGE 35:09 TO 35:11 (RUNNING 00:00:12.249)

09 Q. Was domain name a phrase or a term that  
 10 had been in use other than through the Stanford  
 11 TIP software, to your knowledge?

## Cisco v Arista

---

**13. PAGE 35:13 TO 35:19 (RUNNING 00:00:20.157)**

13           THE WITNESS: It is part of the RFC, request  
 14    for comments, that helps define the domain name  
 15    system. So it is a generic term in that sense.  
 16    Every operating system needs a way -- it doesn't  
 17    need it, but it is a convenience so you can use a  
 18    host name without having to specify the domain  
 19    name.

**14. PAGE 35:20 TO 35:20 (RUNNING 00:00:04.160)**

20           Q.    BY MR. FERRALL: And now let me ask you

**15. PAGE 35:21 TO 35:23 (RUNNING 00:00:06.551)**

21    to turn to Page 17. There's reference on Page 17  
 22    of this exhibit to interface.  
 23           Do you see that?

**16. PAGE 35:25 TO 35:25 (RUNNING 00:00:01.283)**

25           Q.    Yes.

**17. PAGE 36:05 TO 36:15 (RUNNING 00:00:33.310)**

05           Q.    Right. What was the interface command?  
 06    What was the purpose of that?  
 07           A.    It's to model a physical attachment to  
 08    a network. So your Wi-Fi is an interface. Your  
 09    plugging into an ethernet is the interface. So it  
 10    is the software model description of that physical  
 11    connection.  
 12           Q.    Was "interface" a term that had been  
 13    used in the industry before?  
 14           A.    Yes. A lot of operating systems use  
 15    interface.

**18. PAGE 42:08 TO 42:12 (RUNNING 00:00:14.996)**

08           Q.    Are you familiar with either TOPS-20 or  
 09    other operating systems having show commands with  
 10    different level -- multiple levels of hierarchy to  
 11    them?  
 12           A.    Sure.

**19. PAGE 45:20 TO 45:25 (RUNNING 00:00:19.363)**

20           Q.    BY MR. Ferrall: And were you ever  
 21    aware of operating systems growing their command  
 22    list in a way where they would -- they would add,  
 23    for example, further options under the show  
 24    command over time in subsequent versions?  
 25           A.    Oh, yes.

**20. PAGE 46:02 TO 46:05 (RUNNING 00:00:14.046)**

02           THE WITNESS: They would augment the command  
 03    set, the features, and there was, typically, a  
 04    user interface component to it, like modifying the  
 05    menu commands on your laptops today.

**21. PAGE 46:06 TO 46:07 (RUNNING 00:00:07.836)**

06           Q.    BY MR. FERRALL: And was there -- would  
 07    they, typically, build upon existing keywords?

**22. PAGE 46:10 TO 46:14 (RUNNING 00:00:13.510)**

10           THE WITNESS: Depending on the feature set.  
 11    If it was an extension of an existing feature set  
 12    or if it was brand new. I mean, as you described

## Cisco v Arista

---

13 a tree, those trees can be rearranged and  
 14 augmented or removed.

**23. PAGE 46:23 TO 47:01 (RUNNING 00:00:20.309)**

23 Q. BY MR. FERRALL: Mr. Satz, are you  
 24 familiar with any use of a "clear" command from  
 25 either TOPS-20 or early operating systems?  
 00047:01 A. I can't say I recall that.

**24. PAGE 70:07 TO 70:11 (RUNNING 00:00:18.181)**

07 Q. Was there a -- have you ever heard of  
 08 the term "SNMP server"?  
 09 A. Oh, the command line, parsed for the --  
 10 yeah -- configuration? Um-hum. Yes, I created  
 11 that.

**25. PAGE 70:12 TO 70:14 (RUNNING 00:00:14.057)**

12 Q. What's -- is there such a thing as an  
 13 SNMP server, or what does that term mean?  
 14 A. Wow.

**26. PAGE 70:17 TO 70:25 (RUNNING 00:00:36.236)**

17 THE WITNESS: I think all of that code is  
 18 gone now. The SNMP server was the way to tell the  
 19 router software that it was to be an SNMP -- it  
 20 was to start the SNMP protocol. So it would then  
 21 begin to listen to and process SNMP packets. And  
 22 it was probably one of the first commands  
 23 implemented as part of this RFC to implement it  
 24 and create an SNMP protocol within the Cisco  
 25 software.

**27. PAGE 71:07 TO 71:16 (RUNNING 00:00:35.386)**

07 Q. BY MR. FERRALL: What's -- what's the  
 08 notion of community in the context of SNMP?  
 09 A. After a while, you start running out of  
 10 words, so you pick one that tries to create a  
 11 sense of purpose. And so "community" was an  
 12 attempt to describe a collection of users who  
 13 would have a specific purpose with respect to  
 14 using the protocol. It was nothing more than an  
 15 authorization or an access. A password, as it  
 16 were.

**28. PAGE 71:17 TO 71:18 (RUNNING 00:00:07.658)**

17 Q. So if you look at Page 7 of this  
 18 Exhibit 403.

**29. PAGE 71:21 TO 73:11 (RUNNING 00:02:08.315)**

21 Q. BY MR. FERRALL: If you see under  
 22 Section 3.2.5, Definition of Administrative  
 23 Relationships, and then the second paragraph there  
 24 says, quote, appearing of an SNMP agent with some  
 25 arbitrary set of SNMP application entities is  
 00072:01 called an SNMP community.  
 02 Do you see that?  
 03 A. Yes.  
 04 Q. Is that consistent with your definition  
 05 of SNMP community that you just described?  
 06 A. Yeah. It's more mind-numbing when you  
 07 see it in words.  
 08 Q. I couldn't agree more.  
 09 A. Yeah. It turns out a lot of these  
 10 things are written to be really obtuse. They are

**Cisco v Arista**

11 not intended to be obtuse, but they have a  
 12 structure to them that when you turn it into  
 13 English or a simple picture it takes a lot of this  
 14 out. They tried to make a more generic  
 15 mathematical underpinning to a mapping that added  
 16 a level of complexity that just ultimately wasn't  
 17 necessary. But they were trying to be very  
 18 flexible.

19 Q. Okay. But this notion of community as  
 20 described in the Exhibit 403 is the same as the  
 21 community that you understood when you --

22 A. I made the implementation simpler  
 23 because of adding a whole layer. The idea, if I  
 24 can remember any of this craziness, is that you  
 25 would have a table of -- no different than a  
 00073:01 database in today's language -- and you could be  
 02 able pull out individual things. And so they  
 03 wanted to be able to map authorizations to  
 04 individual entries in the database. And the  
 05 implementation I did was to make it an all or  
 06 nothing. Because if somebody wanted that level of  
 07 specificity they'd ask for it and then we'd go  
 08 back and put all that crazy complexity into the  
 09 code. But just because the standard made it that  
 10 flexible we weren't going to go that far. It was  
 11 an engineering choice and cost benefit.

**30. PAGE 75:12 TO 76:03 (RUNNING 00:01:01.329)**

12 Q. So in implementing, for example, the  
 13 SNMP server community function, were you  
 14 responsible either directly or indirectly for  
 15 implementing the functional code?

16 A. I was.

17 Q. All right. And was that directly?  
 18 Were you actually writing that --

19 A. I wrote the code.

20 Q. You wrote the code?

21 A. The first version, yes.

22 Q. And for that function, do you have any  
 23 sense of how long it took you to write that code?

24 A. No. Because it was all part of a much  
 25 larger set of functionality, and so to pull out  
 00076:01 that one little line of parsing, no. I mean  
 02 overall the task was probably two to three months  
 03 to do the full SNMP stack.

**31. PAGE 76:04 TO 76:08 (RUNNING 00:00:18.222)**

04 Q. Okay. And how long did it take you to  
 05 come up with the names for the commands for the --  
 06 for SNMP functionality?

07 A. 15 seconds, conceptually, five seconds.  
 08 I mean, this is the name, type it in, move on.

**32. PAGE 141:01 TO 141:10 (RUNNING 00:00:57.078)**

00141:01 Q. Do you recall any instance in which --  
 02 and excluding any discussions with lawyers -- but  
 03 any instance in which Cisco referred to its CLI  
 04 command set as proprietary?

05 A. I don't. But my -- I kind of stepped  
 06 down before we really got heavily involved into  
 07 the whole copyright patenting era that they ran  
 08 through and said, okay, what can we treat as  
 09 intellectual property. So not during the tenure I  
 10 had.

TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:14:10.719)

Δ DEFENDANT Δ

United States District Court  
Northern District of California

Case No. 5:14-cv-05344-BLF

Case Title Cisco Systems v. Arista Networks

Exhibit No. 9073

Date Entered \_\_\_\_\_

Richard W. Wieking, Clerk  
By: \_\_\_\_\_, Deputy Clerk